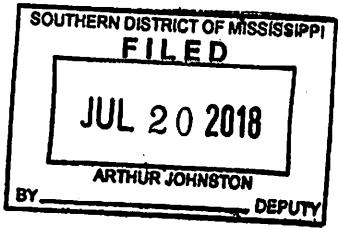


IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION



DOUGLAS HANDSHOE

PLAINTIFF

VS.

CIVIL ACTION NO. 1:15cv382HSO-JCG

VAUGHN PERRET, CHARLES LEARY &
DANIEL ABEL, D/B/A TROUT
POINT LODGE LTD OFNOVA SCOTIA
& IN THEIR INDIVIDUAL CAPACITIES
PROGRESS MEDIA GROUP LIMITED,
MARILYN SMULDERS, TORSTAR
CORPORATION, NATIONAL
GEOGRAPHIC SOCIETY, XYZ
FOUNDATION & JOHN DOES 1-50

DEFENDANTS

**DEFENDANT CHARLES LEARY'S
PRO SE REPLY TO DOUGLAS HANDSHOE'S
OPPOSITION TO LEARY'S MOTION FOR LEAVE TO FILE (ECF 257)**

Mr. Handshoe bases his opposition to Dr. Leary's motion for leave to file his dispositive motion after a deadline solely upon this Honorable Court's decision on sanctions (ECF 222), but offers no rules, statutes, case law, or evidence to support his position.

This Court ordered the following:

Leary is cautioned that all pleadings, motions, and papers he files in the future shall be prepared and personally signed by him or by a licensed attorney of record. Failure to comply with this directive will be deemed contumacious conduct and may result in Leary's filings being stricken, or may result in more severe sanctions, including entry of default judgment or dismissal of any counterclaim pursuant to Federal Rule of Civil Procedure 41(b).

The Court did not say that Dr. Leary could never again file any motions or request leave to file. Mr. Handshoe's opposition is insufficient. Mr. Handshoe himself has filed a dispositive motion after the case management order deadline and is now on his third amended complaint, having once filed an amended complaint without the court's permission. There has been an extraordinary amount of time,

money, and resources expended in this case by all defendants responding to Mr. Handshoe's own filings. Dr. Leary is not being dilatory. The trial date in this case has been extended to October, 2018, and there is no prejudice to Mr. Handshoe in allowing dispositive motions to be filed. Granting such a request would be in accord with Federal Rule of Civil Procedure 1.

Second, Mr. Handshoe has presented no substantive argument, law, or case law against extending deadlines.

This Honorable Court should grant Dr. Leary's motion for the above reasons and those contained in the brief supporting the motion already filed.

Respectfully submitted this the 18th day of July, 2018.



Charles Leary
pro se

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CERTIFICATE OF SERVICE

I hereby certify that, on July 16, 2018, I caused a true and correct copy of the above and foregoing to be filed utilizing the Court's CM/ECF electronic document filing system, which caused notice of such filing to be delivered to all counsel of record and parties requesting notice, and by United States First Class Mail, postage prepaid, to the following non-ECF participants having appeared in this action:

[none]



Charles L. Leary